

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BAIS YAAKOV OF SPRING VALLEY, on
behalf of itself and all others similarly situated,

Plaintiff,

-v.-

Civil Action

13 CV 4564 (CS)(PED)

**RICHMOND, THE AMERICAN
INTERNATIONAL UNIVERSITY IN
LONDON, INC., and AMERICAN
INSTITUTE FOR FOREIGN STUDY, INC.,**

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that at a date and time to be determined by the Court, the undersigned counsel for Plaintiff Bais Yaakov of Spring Valley will move before the Honorable Cathy Seibel, U.S.D.J. at The Hon. Charles L. Brieant Jr. Federal Building & U.S. Courthouse, Courtroom 621, 300 Quarropas Street, White Plains, New York 10601, for an order: (1) certifying two Classes for settlement purposes; (2) granting preliminary approval of the Settlement between the parties pursuant to Rule 23(e) of the Federal Rules of Civil Procedure; (3) approving of the form and manner of providing notice of the class action and proposed Settlement to the Members of the Settlement Classes as set forth in the parties' Settlement Agreement and Release, dated June 30, 2015; (4) setting a deadline for the members of the two Settlement Classes to opt of, or object to, the Settlement between the parties; (5) approving The Garden City Group, Inc. as the Claims Administrator; (6) approving Bais Yaakov of Spring Valley as Class Representative; and (7) approving Aytan Y. Bellin, Esq. and Roger Furman, Esq. as Class Counsel.

Plaintiff will further move that the Court schedule a hearing for the purpose of considering whether to: (1) grant final approval of the Settlement Agreement; (2) enter final judgment in this action; (3) approve an incentive award to Bais Yaakov of Spring Valley; and (4) approve an award of attorney's fees and expenses to Aytan Y. Bellin, Esq. and Roger Furman, Esq.

Dated: White Plains, New York
July 1, 2015

Respectfully submitted,

BELLIN & ASSOCIATES LLC

By: /s/Aytan Y. Bellin

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Co-Counsel for the Plaintiff Bais Yaakov of
Spring Valley and the Classes

CERTIFICATE OF SERVICE

I hereby certify, under the penalties of perjury, that this document filed through the ECF system, will be sent electronically to all counsel of record by the ECF system.

DATED: July ___, 2015

/s/ Aytan Y. Bellin
Aytan Y. Bellin, Esq.